

EXHIBIT N

Mike Matesky

From: Anne Cohen <acohen@bpmlaw.com>
Sent: Wednesday, April 22, 2020 10:22 AM
To: Michael Galletch; kelly.mennemeier@foster.com; Sheeba Roberts; Ben Hodges; Nancy Stephens
Cc: Mike Matesky; Sheeba Roberts; Sean M. Bettis
Subject: RE: ULC v. Maurice King, et. al. - FRCP 30(b)6 Notice

Mike and Mike,

Please consider this a follow up to AMM's prior requests to confer on the FRCP 30(b)6 topics to which AMM objected and declined to designate a witness. With the discovery deadline rapidly approaching, we are seeking confirmation as to whether ULC agrees to forgo testimony from a FRCP 30(b)6 designee on these topics. Although we have attempted to raise this issue via correspondence with you on several occasions— both prior to the FRCP 30(b)6 depositions, as well as since the depositions – we have not had any response.

If a dispute remains as to the topics for which no witness has been designated by AMM, please let us know when you are available to confer. AMM intends to move for a protective order if we are unable to reach agreement; we would like to further understand ULC's position. However, if there is no dispute, there is no need for a protective order.

Please clarify at your earliest convenience.

Sincerely,

Anne Cohen

Director

Admitted in Oregon, Washington and Utah

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